



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Waste Management Division
RCRA Enforcement Office

Purpose: RCRA Compliance Evaluation Inspection

Facility Name: Cal-Tron Plating, Inc.

Facility Location: 11919 Rivera Road
Santa Fe Springs, CA 90670

Facility Mailing Address: Same as above

EPA ID Number: CAD 008 237 950

Date of Investigation: November 4, 2003

EPA Representative(s): Ronald Brown
Environmental Protection Specialist
(415) 972-3292 (415) 947-3530 fax
brown.ron@epa.gov

Cameron McDonald
Environmental Scientist

DTSC Representative(s): None

CUPA Representative(s): None

Facility Representative(s): Carl Troncale, Jr.
Vice President
Cal-Tron Plating, Inc.

Jesus Bautista, operator
Wastewater Treatment Plant

Report Prepared By: Ronald Brown

Date of Report: December 29, 2003

generated by the facility (**Attachment 1**).

The facility submitted a Biennial Report for 2001 as a large quantity generator (> 1,000 kilograms per month) of characteristic hazardous wastes (D001-ignitable, D002-corrosive, D003-reactive, D004-arsenic, D007-chromium, and D008-lead) and listed hazardous wastes (F006-wastewater treatment sludges from electroplating operations, F007-spent cyanide plating bath solutions from electroplating operations, and F009-spent stripping and cleaning bath solutions from electroplating operations where cyanide is used in the process). California waste codes 131, 134, 171, 181, 711, 723, 726, and 792 were also listed in the report.

According to Mr. Troncale, the Biennial Report for 2001, and manifests reviewed during the inspection, the facility is a generator of greater than 1,000 kilograms of hazardous waste per month and these are the regulatory requirements which have been applied to the facility.

The facility was last inspected for compliance with hazardous waste regulations on February 4, 2003, by the City of Santa Fe Springs Fire Department. One RCRA violation, i.e., open hazardous waste containers, was found. Additional non-RCRA violations were also listed in the inspection report.

INSPECTION

After providing introductions and credentials, the inspectors explained that it was a routine inspection. Inspectors and the facility representatives then walked through the facility, focusing on the areas where hazardous wastes were generated and accumulated at the facility (**Attachment 2**).

Walk-Through

Plating area: The metal plating processes are a series of tanks of various acids, bases, plating solutions, and rinse water (**Attachment 3, Photo 1**). When parts are moved from one process tank to another, the various chemicals and rinse water which adhere to the parts drip on the floor. This liquid collects on the floor (**Photos 2-3**) and is pumped to the wastewater treatment plant. Both Mr. Bautista and Mr. Troncale said that the pump used to move waste liquids from the plating area to the wastewater treatment plant had broken and that they had ordered the wrong parts for the pump. Therefore, the pump used to move waste liquids to the wastewater treatment plant was inoperative at the time of the inspection.

According to Mr. Troncale, the floor of the plating area has been lined with epoxy since the installation of the plating tanks in 1976. Mr. Troncale also said that the epoxy floor coating has been periodically and systematically repaired and recoated to maintain its integrity. Mr. Troncale said that he would submit documentation of repairs to the floor coating for the last

By the end of the inspection, the containers in Photo 14 had been moved to separate hazardous waste containers and containers of reusable plating solution, e.g., tin nickel and copper plating solutions (**Photos 15-16**). There was one, 55-gallon drum of hazardous waste (brass stripper) which was correctly marked/labeled but was not closed (only shrink wrapped) and had exceeded the 90-day storage limit i.e., it had an accumulation start date of 7-23-03 (**Photos 17-18**). There were three, five-gallon containers of hazardous waste (electroless nickel) (**Photo 19**). One did not have hazardous waste markings or a label, and the two with labels exceeded the 90-day storage limit for large quantity generators, i.e., both had accumulation start dates of 5-6-03 (**Photo 20**). A hazardous waste determination for both the brass stripper solution and the electroless nickel solution, including any laboratory analysis, is needed for whether these wastestreams are a RCRA hazardous waste and should be manifested with a federal hazardous waste code.

Records Review

Inspectors requested the following records: hazardous waste manifests and land disposal notifications; training records; inspection records; biennial report for hazardous wastes generated in 2001; and contingency plan/Business Emergency Plan information. No violations were observed with the facility's hazardous waste manifests and land disposal notifications, training program, inspection records (**Attachment 4**), 2001 biennial report, or contingency plan/Business Emergency Plan.

Mr. Troncale was able to find the last proposal for work from Dodge Concrete Surfaces to repair the epoxy lining of the plating area floor (**Attachment 5**). However, he was not able to obtain more documentation of repair/maintenance of the epoxy coating of the plating area floor during the inspection. Inspectors requested documentation for the last three-five years. Mr. Troncale said that he should be able to obtain these from his records or his contractors that did the work, and would provide them to U.S.EPA.

An exit briefing was held with Mr. Troncale at the end of the inspection, and U.S.EPA inspectors summarized the preliminary findings of the inspection.

ADDITIONAL INFORMATION RECEIVED

On November 19, 2003, Mr. Troncale submitted four hazardous waste manifests (22003060 - 22993063) for the shipment of RCRA and non-RCRA hazardous wastes from the facility and a photograph of the completed raw materials and hazardous waste storage shed (**Attachment 6**).

However, no additional documentation of maintenance or repair to the epoxy lining of the plating area floor has been received.

procedure. However, a RCRA hazardous waste for chromium has a threshold of 5 mg/l (total) chromium using the federal Toxicity Characteristic Leaching Procedure (TCLP) laboratory procedure. While the results from these two procedures are not directly comparable using a mathematical conversion factor, the laboratory procedures are very similar except for such things as the acid used to digest sample solids and the use of a Zero Head Extractor in the TCLP laboratory procedure.

According to pages 3-7 to 3-9 of Cal-Tron's Hazardous Waste Management Plan (Inspection Report, Attachment 1), Cal-Tron's first step in determining if a waste with chromium is a hazardous waste is to determine if the waste exceeds the RCRA hazardous waste levels for chromium using the TCLP laboratory procedure. Therefore, you are to submit TCLP results for the wastes in question, or use generator's knowledge that the (total) chromium concentration does not exceed the federal hazardous waste characteristic concentration for chromium.

- b. A fourth, quarter-filled Supersack of floor sweepings particles was open and did not have the required hazardous waste marking/labeling information (**Photos 9-10**). A hazardous waste determination, including any laboratory analysis, is needed for the floor sweepings.
 - c. Along the fence on the north side of the property was one, 55-gallon drum of hazardous waste/brass stripper (**Photos 17-18**). There were also three, five-gallon containers of hazardous waste/electroless nickel (**Photo 19**). Hazardous waste determinations, including any laboratory analysis, are needed for both the brass stripper solution and the electroless nickel solution to determine whether either of these wastestreams is a RCRA hazardous waste and should be manifested with a federal hazardous waste code.
2. Failure to mark or label satellite accumulation containers of hazardous waste as required by 22 CCR §§ 66262.34(e)(1)(C) and (E), and 66262.34(f)(3) [40 CFR § 262.34(c)(1)(ii)].

22 CCR § 66262.34 - Accumulation Time.

(e)(1) A generator may accumulate as much as 55 gallons of hazardous waste, one quart of acutely hazardous waste (listed in section 66261.33(e)) or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status, without complying with subsections (a), (b) and (c) of this section, if all of the following requirements are met with respect to this waste:

...
(C) the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;

...
(E) the generator complies with subsections (e)(2), (e)(3) and (f)(3) of this section.

(f) Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements:

...
(3) each container and tank used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words, "Hazardous Waste." Additionally, all containers and portable tanks shall be labeled with the following information:

(A) composition and physical state of the wastes;

(B) statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);

(C) name and address of the person producing the waste.

55-gallon drum of polishing dust/metal particles resulted from the cleaning of the vacuum system when it was broken.

- c. There were three, five-gallon containers of hazardous waste (electroless nickel) **(Photo 19)**. One did not have hazardous waste markings or a label with the required information.
5. Failure to close hazardous waste containers being accumulated on-site as required by 22 CCR §§ 66262.34(a)(1)(A) and 66265.173(a) [40 CFR §§ 262.34(a)(1)(i) and 265.173(a)].

22 CCR § 66262.34 - Accumulation Time.

(a) Except as provided in subsections (c) and (d) of this section and section 66262.35, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status, provided that:

(1)(A) the waste is placed in containers and the generator complies with the applicable requirements of articles 9, 27, 28 and 28.5 of chapter 15 of this division, or the waste is placed in tanks and the generator complies with articles 10, 27, 28, and 28.5 of chapter 15 of this division, except sections 66265.197(c) and 66265.200. In addition, such a generator is exempt from all the requirements in articles 7 and 8 of chapter 15 of this division, except for sections 66265.111 and 66265.114; or

22 CCR § 66265.173 - Management of Containers.

(a) A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste.

Potential violations:

- a. A third, three-quarter-filled Supersack of polishing dust/metal particles was open **(Photo 7)** but did have the required hazardous waste marking/labeling information **(Photo 8)**.
- b. A fourth, quarter-filled Supersack of floor sweepings particles was open and did not have any of the required hazardous waste marking/labeling information **(Photos 9-10)**.
- c. A 55-gallon drum of polishing dust/metal particles was not closed and did not have the required hazardous waste marking/labeling information **(Photo 11)**. According to facility representatives, this 55-gallon drum of polishing dust/metal particles resulted from the cleaning of the vacuum system when it was broken.
- d. In the center of the paved area on a wood pallet were two, 15-gallon drums of RCRA hazardous waste/chrome solution (D002, D007, D008, CA code 726) which were correctly marked/labeled, but were not closed because the shrink wrap covering the tops of the drums would not prevent a spill if the containers fell or were tipped over **(Photos 12-13)**.
- e. Along the fence bordering the north side of the paved area was one, 55-gallon drum of hazardous waste (brass stripper) which was correctly marked/labeled but was not closed (only shrink wrapped) and had exceeded the 90-day storage limit i.e., it had an accumulation start date of 7-23-03 **(Photos 17-18)**.
6. Failure to maintain adequate aisle space between containers of hazardous waste as required by 22 CCR §§ 66262.34(a)(4) and 66265.35 [40 CFR §§ 262.34(a)(4) and 265.35].

22 CCR § 66262.34 - Accumulation Time.

start dates of 5-6-03 (**Photo 20**).

NON-RCRA POTENTIAL VIOLATIONS: None at this point.

ATTACHMENTS

1. Pages 3-7 through 3-9 of the facility's Hazardous Waste Management Plan
2. Site map of the facility
3. Photographs
4. Facility's hazardous waste inspection checklist for September 2003
5. 9-22-03 fax from the facility with 9-22-03 preliminary proposal by Dodge Concrete Surfaces to repair concrete floors in the containment area at the main shop with epoxy
6. Nov. 19, 2003 facility submittal of four hazardous waste manifests (22003060 - 22993063) for the shipment of RCRA and non-RCRA hazardous wastes from the facility and a photograph of the completed raw materials and hazardous waste storage shed

Miss Cameron McDonald
RCRA Enforcement Office (WST-3)
Waste Management Division
U.S.EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

August 25, 2004

Dear Miss McDonald:

I am the consulting engineer that has been retained by Cal Tron Plating to assist them in answering the questions that you have asked.

In response to your letter regarding the facility visit at Cal Tron Plating on November 4th 2003, we are submitting the following information:

1. The epoxy coating under the plating tanks has been recovered with a polyethylene liner. This liner is resistant to acids, caustics, and metal salts that are commonly handled at our facility.
2. We have sent samples of the waste stream that you have identified in your report, and we have enclosed the lab analysis of the TCLP data for CAM metals.
3. All hazardous waste containers are properly labeled, and we have included photographs of typical container labels for you to review.
4. Polishing dust is continually being generated at our facility. It is the policy of the facility to repair the vacuum system when it is observed to be broken.
5. Aisle space between the hazardous waste storage area and the material storage shed is being maintained. We have included photographs demonstrating this with this letter.
6. All hazardous waste is being removed from the facility within the 90 day time period that a large quantity generator is allowed. Please review the photographs of the hazardous waste labels that we have submitted with this letter.

Please review the information that we have submitted to you with this letter, and please provide us with your comments. If there are any deficiencies, please let me know, and we will provide you with the information that you require to correct them.

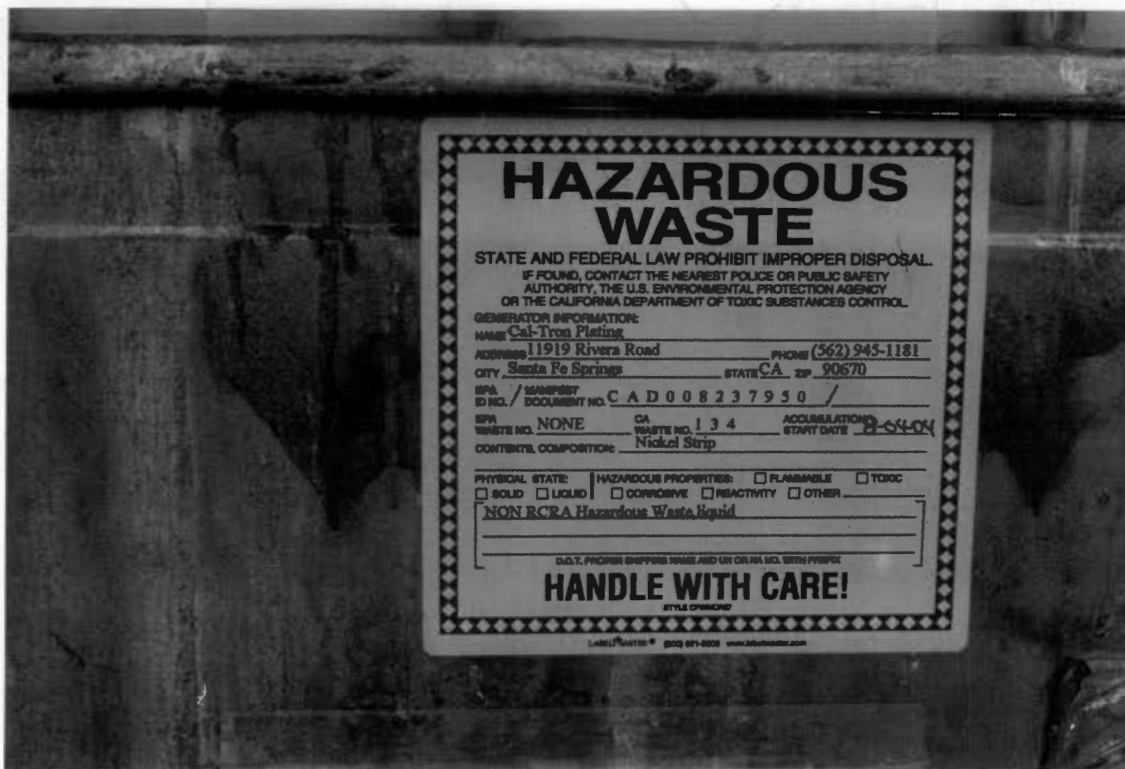
You may contact me at (562) 434-5017.

Thanks for your help and cooperation.

Sincerely,

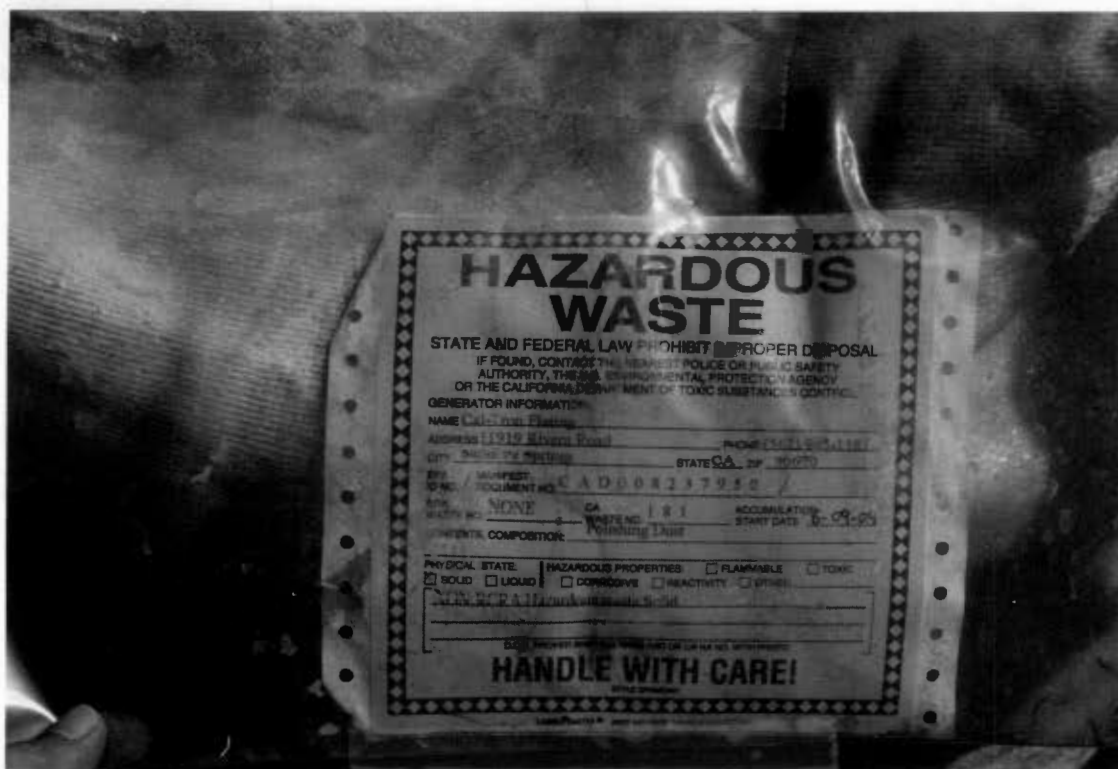


Oscar Malkhoo, PE
Consulting Engineer



**HAZARDOUS WASTE LABEL
SHOWING ACCUMULATION START DATE**





**HAZARDOUS WASTE LABEL
SHOWING ACCUMULATION START DATE**



**HAZARDOUS WASTE STORAGE
SHOWING SPACE BETWEEN ISLES**

CAL-TRON PLATING, INC.

11919 RIVERA ROAD
SANTA FE SPRINGS, CA 90670

PHONE 562 945-1181
FAX 562 693-5086

Mr. Joseph Zimmer
Laboratory Director
Western Analytical Laboratories, Inc.
13744 Monte Vista Avenue
Chino, CA 91710

Dear Mr. Zimmer:

Attached please find 4 samples that we require to have TCLP analysis for. These samples are labeled Polishing Dust, Floor Sweepings, Waste Brass Stripper solution, and Waste Electroless Nickel solution. We would like to have TCLP analysis for CAM Metals for these four samples.

I have also included a copy of the letter that the EPA has given us requesting this data. I hope that this will help you in your determination.

If there are any questions, please feel free to contact me at (562) 434-5017.

Sincerely,



Oscar Malkhoo,
Consulting Engineer

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WESTERN ANALYTICAL LABORATORIES, INC.

13744 MONTE VISTA AVENUE - CHINO, CALIFORNIA 91710-5512 - PHONE (909) 627-3628 - FAX (909) 627-0491 - <http://www.wal.cc>

DATE RECEIVED: 08/06/04 WAL NO.: 04080063
DATE REPORTED: 08/23/04
CUSTOMER: CAL-TRON PLATING INC TCLPMETAL
ADDRESS: 11919 RIVERA RD, SANTA FE SPRINGS, CA 90670
ATTENTION: CARL TRONCALE C070
SAMPLE I.D.: Solid Waste
SAMPLE POINT: POLISHING DUST
SAMPLED BY: Customer
DATE & TIME SAMPLED: 08/04/04

PARAMETER		VALUE UNIT	DETECTION LIMIT	METHOD
ANALYSIS OF TCLP EXTRACT:				
Arsenic	<	0.1 mg/l	0.1	EPA 6010
Barium		1.26 mg/l	0.01	EPA 6010
Cadmium	<	0.01 mg/l	0.01	EPA 6010
Chromium (total)		0.01 mg/l	0.01	EPA 6010
Lead		10.0 mg/l	0.1	EPA 6010
Mercury	<	0.001 mg/l	0.001	EPA 7471
Selenium	<	0.1 mg/l	0.1	EPA 6010
Silver	<	0.01 mg/l	0.01	EPA 6010



Joseph P. Zimmer, Laboratory Director

FAX TO 562-693-5086
JA

STATE CERTIFIED LABORATORY - INDUSTRIAL WASTE WATER - HAZARDOUS WASTE - DOMESTIC WATER
METAL FINISHING SOLUTION ANALYSIS AND PROCESS CONTROL

WESTERN ANALYTICAL LABORATORIES, INC.

13744 MONTE VISTA AVENUE - CHINO, CALIFORNIA 91710-5512 - PHONE (909) 627-3628 - FAX (909) 627-0491 - <http://www.wal.cc>

DATE RECEIVED: 08/06/04 WAL NO.: 04080064
DATE REPORTED: 08/23/04
CUSTOMER: CAL-TRON PLATING INC TCLPMETAL
ADDRESS: 11919 RIVERA RD, SANTA FE SPRINGS, CA 90670
ATTENTION: CARL TRONCALE C070
SAMPLE I.D.: Solid Waste
SAMPLE POINT: FLOOR SWEEPINGS
SAMPLED BY: Customer
DATE & TIME SAMPLED: 08/04/04

PARAMETER	VALUE	UNIT	DETECTION LIMIT	METHOD
ANALYSIS OF TCLP EXTRACT:				
Arsenic	<	0.1 mg/l	0.1	EPA 6010
Barium		0.40 mg/l	0.01	EPA 6010
Cadmium	<	0.01 mg/l	0.01	EPA 6010
Chromium (total)		1.04 mg/l	0.01	EPA 6010
Lead	<	0.1 mg/l	0.1	EPA 6010
Mercury	<	0.001 mg/l	0.001	EPA 7471
Selenium	<	0.1 mg/l	0.1	EPA 6010
Silver	<	0.01 mg/l	0.01	EPA 6010



Joseph P. Zimmer, Laboratory Director

FAX TO 562-693-5086
JA

STATE CERTIFIED LABORATORY - INDUSTRIAL WASTE WATER - HAZARDOUS WASTE - DOMESTIC WATER
METAL FINISHING SOLUTION ANALYSIS AND PROCESS CONTROL

WESTERN ANALYTICAL LABORATORIES, INC.

13744 MONTE VISTA AVENUE - CHINO, CALIFORNIA 91710-5512 - PHONE (909) 627-3628 - FAX (909) 627-0491 - <http://www.wal.cc>

DATE RECEIVED: 08/06/04 WAL NO.: 04080065
DATE REPORTED: 08/23/04
CUSTOMER: CAL-TRON PLATING INC TCLPMETAL
ADDRESS: 11919 RIVERA RD, SANTA FE SPRINGS, CA 90670
ATTENTION: CARL TRONCALE C070
SAMPLE I.D.: Liquid Waste
SAMPLE POINT: WASTE BRASS STRIPPER
SAMPLED BY: Customer
DATE & TIME SAMPLED: 08/04/04

PARAMETER		VALUE UNIT	DETECTION LIMIT	METHOD
ANALYSIS OF TCLP EXTRACT:				
Arsenic	<	0.1 mg/l	0.1	EPA 6010
Barium		0.05 mg/l	0.01	EPA 6010
Cadmium		0.11 mg/l	0.01	EPA 6010
Chromium (total)		0.05 mg/l	0.01	EPA 6010
Lead		1.6 mg/l	0.1	EPA 6010
Mercury	<	0.001 mg/l	0.001	EPA 7471
Selenium	<	0.1 mg/l	0.1	EPA 6010
Silver	<	0.01 mg/l	0.01	EPA 6010



Joseph P. Zimmer, Laboratory Director

FAX TO 562-693-5086
JA

STATE CERTIFIED LABORATORY - INDUSTRIAL WASTE WATER - HAZARDOUS WASTE - DOMESTIC WATER
METAL FINISHING SOLUTION ANALYSIS AND PROCESS CONTROL

WESTERN ANALYTICAL LABORATORIES, INC.

13744 MONTE VISTA AVENUE - CHINO, CALIFORNIA 91710-5512 - PHONE (909) 627-3628 - FAX (909) 627-0491 - <http://www.wal.cc>

DATE RECEIVED: 08/06/04 WAL NO.: 04080066
DATE REPORTED: 08/23/04
CUSTOMER: CAL-TRON PLATING INC TCLPMETAL
ADDRESS: 11919 RIVERA RD, SANTA FE SPRINGS, CA 90670
ATTENTION: CARL TRONCALE C070
SAMPLE I.D.: Liquid Waste
SAMPLE POINT: WASTE ELECTROLESS NICKEL
SAMPLED BY: Customer
DATE & TIME SAMPLED: 08/04/04

PARAMETER		VALUE UNIT	DETECTION LIMIT	METHOD
ANALYSIS OF TCLP EXTRACT:				
Arsenic	<	0.1 mg/l	0.1	EPA 6010
Barium		0.06 mg/l	0.01	EPA 6010
Cadmium		0.13 mg/l	0.01	EPA 6010
Chromium (total)		0.62 mg/l	0.01	EPA 6010
Lead		0.9 mg/l	0.1	EPA 6010
Mercury	<	0.001 mg/l	0.001	EPA 7471
Selenium	<	0.1 mg/l	0.1	EPA 6010
Silver	<	0.01 mg/l	0.01	EPA 6010



Joseph P. Zimmer, Laboratory Director

FAX TO 562-693-5086
JA

STATE CERTIFIED LABORATORY - INDUSTRIAL WASTE WATER - HAZARDOUS WASTE - DOMESTIC WATER
METAL FINISHING SOLUTION ANALYSIS AND PROCESS CONTROL